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April 9, 2021

*Via ECF*  
Hon. Sidney H. Stein  
United States District Judge  
500 Pearl Street, Room 23A  
New York, New York 10007

**MEMO ENDORSED**

In Re: Diamond Family Foundation 20-mc-291 (SHS)

Dear Judge Stein:

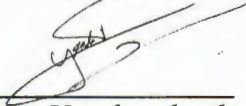
We write jointly on behalf of Applicant Diamond Family Foundation, and Intervenor Pancheron Global Limited, the Rough Family Foundation and Rajesh Mehta.

At the hearing held on April 5, 2021, this Court directed the parties to submit a proposed joint protective order by Friday April 9, 2021.

While the parties have exchanged drafts of the protective order, and have conferred multiple times since the hearing, the parties need additional time to obtain further input from their respective clients and foreign counsel, all of whom are overseas. Accordingly, the parties are respectfully seeking an extension to Tuesday April 13, 2021 to submit a proposed protective order for the Court's consideration.

Respectfully submitted,

**KELLNER HERLIHY GETTY &  
FRIEDMAN, LLP**

By:   
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*Attorneys for Applicant*

**WUERSCH & GERING**

By:           /s/            
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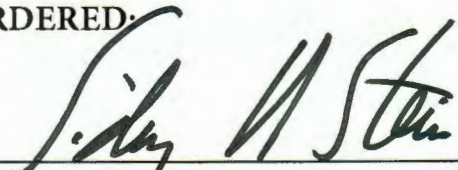
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**Request granted.**

**Dated: New York, New York  
April 9, 2021**

**SO ORDERED:**

  
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Sidney H. Stein, U.S.D.J.